South Carolina Department of Labor, Licensing and Regulation Division of Labor Office of Occupational Safety and Health Columbia, South Carolina 29211

OSH Program Directive Number 76-1910.217-5

Subject: Applicability of Pullout and Holdout or Restraining Devices Under

Section 1910.217.

Standard: Article VI, Section 1910.217 (c) (3) (iv) and (vi), Rules and

Regulations, Commissioner of Labor, State of South Carolina.

Cross Reference to

Federal Standards: 29 CFR 1910.217 (c) (3) (iv) and (vi).

Background: The purpose of this directive is to assure uniformity in application

of the subject standards to point of operation guarding on

mechanical power presses.

Several letters of inquiry have been received requesting clarification as to the applicability of pullout and holdout or restraining devices under Section 1910.217 (c) (3) (iv) and (vi).

The two main questions that arose were:

a. Do these devices, by themselves, constitute or provide sufficient protection from the point of operation danger zone of power presses as set forth in paragraph (c) (1) (i) of this section? Yes

b. Are control reliability and brake system monitoring under (b) (13) and (14) of this section required when these devices are used? No

Interpretation:

- a. When pullout and holdout or restraint devices alone are used on mechanical power presses with either a part or full revolution type clutch, they are considered to be sufficient protection within the intent of these standards when they meet all other requirements as set forth in paragraph (c) (3) (iv) and (vi) of Section 1910.217.
- b. Control reliability and brake system monitoring are required only when a power press equipped with a part revolution clutch meets both criteria of Section 1910.217 (c) (5); i.e., "where the operator feeds or removes parts by placing one or both hands in the point of operation, and a two hand control, presence

sensing device or type B gate or moveable barrier (on a part revolution clutch) is used for safeguarding".

Effective Date: This instruction is effective upon receipt and will remain in effect

until cancelled or superseded by amendment to the regulation or

program directive.

William M. Lybrand, Director February 23, 1976